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April 12, 1999

The Honorable William E. Kennard
Chairman
Federal Communications Commission
Portals II
445 12th Street, SW
Washington, DC 20554

Re: Declaratory Ruling in CC Docket No. 96-98 and Notice of
Proposed Rulemaking in CC Docket No. 99-68

Dear Chairman Kennard:

The Alliance for Public Technology (APT) is encouraged by the Commission's recent Declaratory Ruling and request for comments on the Notice of Proposed Rulemaking (NPRM) concerning compensation for ISP-bound traffic (reciprocal compensation). By ruling that ISP-bound traffic "is jurisdictionally mixed and appears to be largely interstate," the Commission took a step in the right direction. However, we believe that residential consumers and small businesses would realize greater benefit if the Commission were to end entirely the reciprocal compensation payment system as it relates to Internet calls.

As we previously stated, the incredible growth of the Internet and its use has led to an imbalance in the reciprocal compensation payments made by ILECs to CLECs. We believe this imbalance is diverting significant capital from ILEC deployment of advanced networks, thereby threatening universal advanced infrastructure deployment under Section 706 of the Act.

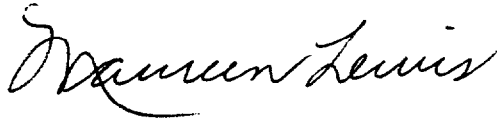
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The goal of the Telecommunications Act of 1996 is to ensure that all Americans have access to advanced telecommunications services. Do not let the current regime of reciprocal compensation payments defeat this fundamental goal of the Act.

Sincerely,

A handwritten signature in cursive script, reading "Maureen Lewis". The signature is written in dark ink and is positioned above the printed name and title.

Maureen Lewis
General Counsel

cc: Commissioner Susan Ness
Commissioner Harold Furchtgott-Roth
Commissioner Michael Powell
Commissioner Gloria Tristani
Secretary Magalie Roman Salas